ENVIRONMENTAL UNIT - WEEKLY ACTIVITY REPORT

DISTRIBUTION

T. W. Butler	540, 055-JA12
M. G. Chavez	031, 055-SS25
P. C. Coulter	091, 055-AB57
G. Gaylord	622, 055-T038
D. C. Gibbs	638, 055-HB13
J. V. Horwatt	874, 001- B03
D. C. Hunter	564, 055-JA18
J. A. Kucinskas	014, 055-EA35
R. H. Lancet	638, 055-HA02
K. H. Lynch	541, 055-JA14
L. E. Lukunich	546, 055-AD06
J. Monaghan	598, 055-SS06
D. Ploszaj	540, 055-JA14
R. Reisenweber	870, 001-110, SG05
G. M. Richards	574, 055-AB05
O. S. Roberson	565, 055-LB05
C. J. Rozas	551, 055-CB01
M. Robertson	539, 055-SS12
M. C. Shoemaker	539, 055-AC10
E. J. Wooster	564, 055-AB34
D. J. Zweng	622, 055-T038
Environmental Staff	

BNA02523022

HDMSe00239116

Internal Letter

Rockwell International

Date . 31 January 1990

No. . 90EU-034

TO: (Name, Organization, Internal Address)
. J. H. Keller
. Rocketdyne-SSFL
. 540, 055-JA10

FROM: (Name, Organization, Internal Address, Phone)
. S. R. Lafflam
. Rocketdyne-SSFL
. 543, 055-JA16
. 392-5301

Subject . Environmental Unit - Weekly Activity Report

PROBLEMS - Nothing of significance to report.

ACHIEVEMENTS - Nothing of significance to report.

INFORMATION

Redacted

Redacted

Redacted

Molton Salt PDU D&D (B/005) - The DOE is not expected to provide additional funding for the D&D of the PDU in FY90. The emphasis of the work over the remaining few weeks of funding will be to complete as much of the cleanup as possible and leave the site in a position to prevent rain damage or environmental contamination until funding is complete in FY91. The Environmental Unit is scheduling the disposal of the waste generated to date and is assessing the status of any remaining potential hazardous waste (i.e. the refractory) and its disposition during the interim of the shut-down.

Hazardous Waste Management (SSFL) - On 16 January, the corresponding manifests for wastes transported off-site to TSD facilities within the States of California, Arkansas and Texas were sent to the California DHS per state requirements found in Title 22, California Code of Regulations.

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On 7 November, 1989, the Ventura County Environmental Health Department visited SSFL to inspect the hazardous waste operations in all areas. A Hazardous Waste Generator Inspection Report was received on 10 January noting several areas of concern. The Environmental Unit responded to all concerns, many of which appear unwarranted.

EC 03.10 and EC 03.20 Updates - Environmental Control Manual Procedures EC 03.10, Industrial Wastewater Monitoring and Treatment Systems, and EC 03.20, Industrial Wastewater Collection and Analyses, have been extensively rewritten and updated. The revised procedures are being distributed for review.

Air Stripping Towers Permitting (SSFL) - Temporary Permit to Operate #1344-013 was received from the VAPCD for the Bravo and Area I Road stripping towers. CE Environmental performed the required source testing on 23-24 January 1990. Although invited, the District did not attend. The source test report is due for submittal to the District within 90 days of the tests. Copies of the temporary permit have been transmitted to the responsible parties for posting.

Areas I & II Permit Adjustment (SSFL) - Draft permit to operate #0228 was received from the VAPCD and contains revisions that resulted from an evaluation of solvent usage in the Equipment and Instrument Labs (Area I). An invoice for permit processing fees of $3919.12 was also received. Copies of the draft permit will be given to the affected parties and will be reviewed, along with the fee calculations, for accuracy.

Solvent Reduction - Environmental has reviewed solvent usage data for CY1988-89 and prepared tabulations and bar charts showing that TCA and Freon solvent usage had declined approximately 10 and 25 percent, respectively, from 1988 to 1989. Environmental is also compiling similar data for TCA and Freon from purchase orders for verification. Data tables and charts that have been developed will be provided to the Hazmat Elimination Team in its efforts to further reduce solvent consumption.

Van de Kamp/Hayden Initiative - An assessment of the Van de Kamp initiative (the Environmental Protection Act of 1990) was given to Spectrum Economics, a contractor working for a coalition of CMA, Chamber of Commerce and others. Rockwell - State Governmental Relations has been working with Spectrum Economics in developing a strategy for addressing the initiative.

VAPCD 1989 Process Rate Survey (SSFL) - Environmental has received from the VAPCD a survey form seeking process rate information for 1989. The form requests data on combustion sources, tankage loading and handling, and surface coating/solvent sources. This request appears far more extensive than the District 1988 Degreasing Solvent Use Survey filed last October. An IL is in preparation for notifying generating departments of the data requirement.

SSFL Community Tour - Environmental has completed the final revisions to the script for the SSFL Community Tour to be held on a Saturday (date to be determined). All areas of the facility will be open to four bus tours accommodating a total of 180 residents.

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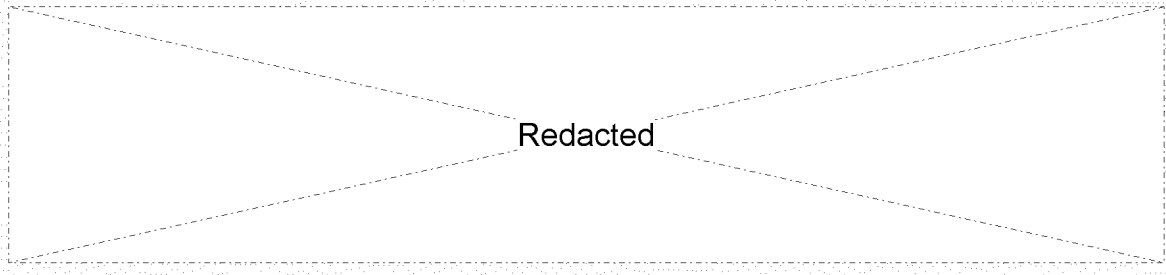
CFC Substitution - The Hazardous Material Elimination Team held a meeting with ME&T, MTS, Environmental, F&PO, and Purchasing on 23 January 1990 to discuss the timeline for phasing out Freon and TCA use at Rocketdyne. These materials are regulated under the Montreal Protocol, however, proposed state regulations could severely limit halogenated solvent use as early at 1993.

The major outcome in the discussion between ME&T and MTS is that MTS will retract the "option" of using halogenated solvents and use non-halogenated solvents where applicable. Additionally, in order to prevent the implementation of halogenated solvent use in new specifications, ME&T will educate engineers as to the restrictions of halogenated solvents. Finally, on-going specifications will be reviewed to determine the feasibility of replacing regulated solvents with non-regulated materials.



AQMP Rule 109 Variance - Letters have been prepared for submittal to the manufacturers of those products which contain chemicals regulated by Rule 109. Rockwell has requested manufacturers document the VOC content and state what EPA or ASTM method was used to determine the VOC content.

A letter has been prepared for submittal to the AQMD listing those products which contain chemicals for which Rockwell has been granted a variance. The list is to be sent to the agency on a monthly basis, adding or deleting materials and listing any VOC/vapor pressure data as they are obtained.

Environmental Engineering Service Agreement - A statement of work and supporting documentation has been prepared to establish a service agreement with McLaren Environmental Engineering to perform specific tasks relating to risk assessments, legislative review, and community relations.

Instrument Specialists Contract Renewal - A new statement of work and 25R was generated to implement the expansion of pH/ORP calibration and monitoring services performed by Instrument Specialists. The contract will be converted to a T&M type at the same time.

Los Angeles City Bureau of Sanitation - Frequency of Reporting - A letter is being prepared to confirm a telephone conversation between the Bureau and the Environmental Unit regarding the frequency of reporting that is required of Rocketdyne.

Update on the SSFL Leachfield History - A letter was sent to the RWQCB updating the leachfield history at SSFL. The original historical records used an old map dated 1962 and listed Area IV as a part of Area III. This was corrected in the letter sent out 26 January 1990.

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EPA Seminar on Wastewater Treatment, Plant Toxicity Evaluation, Reduction and Control - Environmental was represented at a seminar on wastewater treatment plant toxicity evaluation, reduction and control in Oakland on 18-20 January 1990. The seminar presented information on identifying toxic pollutants in waste streams and methods available for toxicant control.

Federal Facility Environmental Compliance in California - Environmental attended a seminar on federal facility compliance in California on 25-26 January 1990. Topics discussed included applicability of state law to federal facilities, auditing, liability and enforcement.

DHS Meeting - On 23 January 1990 Environmental met with the Department of Health Services (DHS), Toxic Substances Control Division regarding the 10 surface impoundments under closure at the SSFL and the Part B permit submittals for ground water remediation systems and the Area I burn facility.

DHS stated that the closure requirements would not be satisfied until post-closure plans were submitted for each individual impoundment. They further stated that Rocketdyne could perform additional sampling to demonstrate clean closure, but they felt it would be an up-hill battle. Environmental has contacted GRC to prepare sampling plans to demonstrate clean closure and insert the sampling plans in post closure plans for each impoundment. The post closure plans should be complete prior to 1 March 1990. A letter regarding the post closure plan schedule will be submitted to the Department.

DHS outlined specific information which they expect to be included with the Part B permit submittals for the SSFL Ground water remediation system and the Area I Burn Facility. Information required for the stripping towers includes rationale for design selection and location, how ground water is monitored, length of time required to clean up ground water, and operating/sampling procedures. A waste analysis plan, operating procedures and safety procedures. The complete Part B permit application is due on 12 April.

SSFL Surface Impoundment Closures - Environmental is supplying the DHS Hazardous Materials Lab/Berkeley documents, rationale, and a position statement regarding the validity of the practical quantitation units (PQLs) and detection levels for the chemical analyses submitted during the surface impoundment closure process at SSFL. A copy will go to the DHS/Burbank because the Permitting Unit has agreed to abide by review of the data made by the Berkeley lab quality assurance personnel. At stake is the acceptance/ rejection of the soil sampling results generated during closure of the surface impoundments. Environmental contends that the Burbank/DHS reviewer has mixed up the methodology and insisted upon lower detection limits (in some cases by factors of 600-1000) than the cited method requires.

SSFL Ground Water Program - The discussion of the practical aspects of remediating TCE-contaminated ground water via the sewage treatment plants (STPs) has been prepared by Environmental and is in the signature loop. Experiments at the Area I STP will commence following management approval to do so. The most significant factor would be the significant downscaling of the treatment volume if this route were taken.

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GRC informed Environmental that the radioactivity data on the Area IV wells will not arrive from the outside labs in order to supply EPA with the data as they requested by 17 February 1990. There are still outstanding results to be acquired on the SSFL background radioactivity levels (natural emitters) which will delay the report until March 1990. Although the background data was not a regulatory requirement it supports Rocketdyne's position that the natural emitters contribute very significantly to any radioactivity found at SSFL.

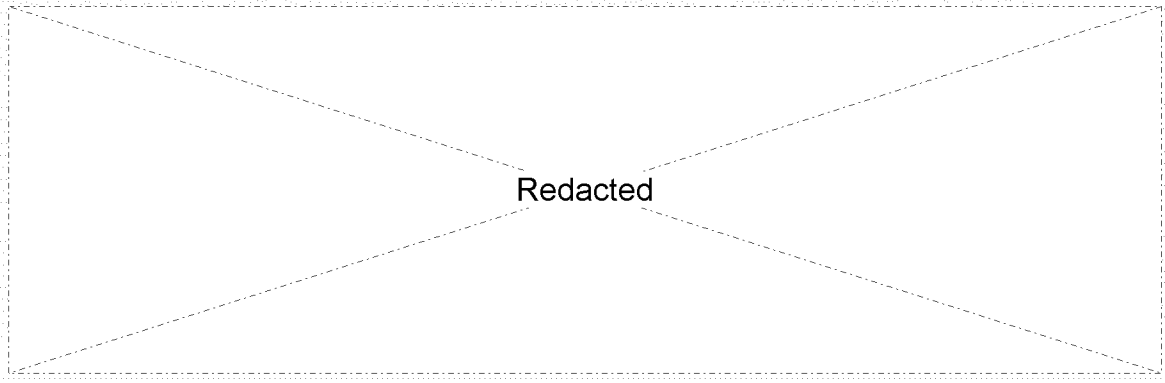
Air Stripping Towers - Compliance testing of the Area I Road and Bravo air stripping towers were conducted on 23-24 January 1990. Analysis of data and a report of the test are due within 60 days. Compliance testing is required by the Ventura County Air Pollution Control District (VAPCD) to obtain a permit to operate the air stripping towers. These are the last two towers to be activated and tested for the VAPCD permit. If accepted, there will be a total of five locations under the permit at SSFL.

Area IV/DOE Activities - Environmental and its consultants, GRC, accompanied two members of the RWQCB to collect and split soil samples from the former Sodium Burn Pit. A total of three sampling trenches were dug with a backhoe, two in the lower pond and one in the upper pond. One trench in the lower pond was observed to have both visual contamination and odors. Split soil samples were collected and analyzed for pH, metals, Volatile Organic Compounds, and gross alpha and beta radiation. If the results from the soil sample analyses exceed any California limits, the RWQCB will request that Rocketdyne prepare a plan for remediation of the contaminated areas.

A member of the Environmental Safety and Quality Assurance Division (ESQA) from DOE/SAN was on-site on 26 January 1990 to conduct an Area IV site inspection. Areas of interest were: surface water sampling points, ETEC hazardous waste storage area, burn pit, and the Area II hazardous waste storage area (HWSA). Seven drums of waste oil from SCTI were found at the HWSA. ETEC waste should not be stored at the HWSA in Area II.

Funding for the construction and development of the two off-site ground water monitoring wells near RMDF and the burn pit has been made available by DOE/SAN and DOE/HQ. Funding is also available for the assessment of the burn pit.

The Environmental Protection Implementation plan (EPIP) has been submitted to Rocketdyne and ETEC management for final review and comments. After this period is over, the EPIP will be formally transmitted to DOE/SAN.



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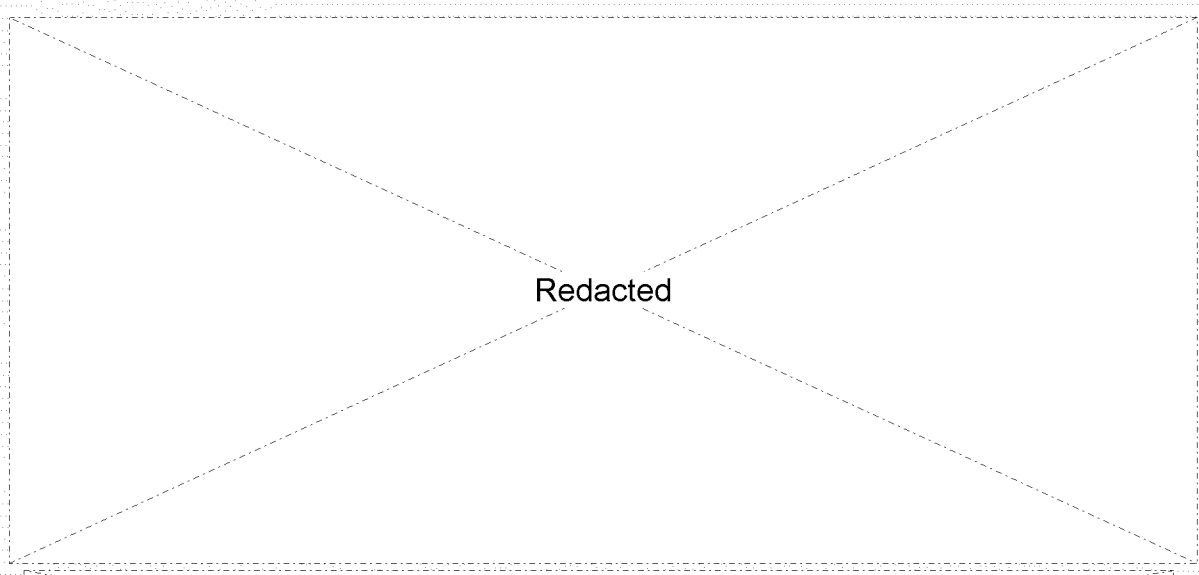

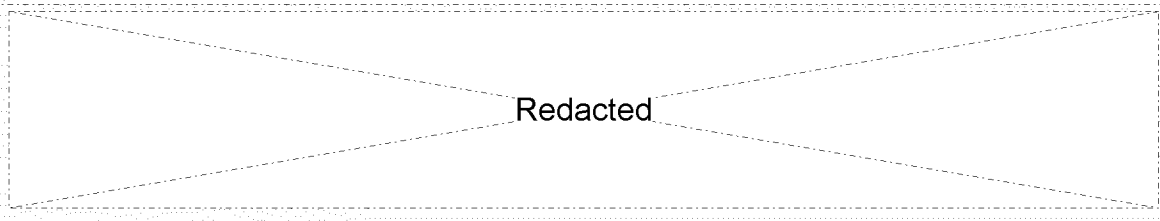

JOB SHOPPERS - Alan Nelson

Jennifer Crone for
S. R. Lafflam, Manager
Environmental Unit

SRL/sj-0996H

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